

June 22 Portland Harbor FS Key Elements Check-in Meeting

Proposed Meeting Objectives and Pre-Meeting Information

This memorandum outlines EPA's proposed meeting objectives and the information that should be provided to EPA prior to the June 22 FS Check-in meeting to help make the meeting more effective and productive

JUNE 22 FS Key Elements Check-in Meeting

Meeting Objectives

The objective for the meeting is to review and get concurrence on the following items:

1. The process for arriving at RALs and preliminary RALs.
2. Concept for SMAs and rationale and results for conversion of AOPCs into SMAs, and also harbor-wide SMAs.
3. Technology screening and assembly of preliminary alternatives, and determination that the preliminary alternatives represent a comprehensive and logical set.
4. Screening of preliminary alternatives, including performance measures or criteria used to eliminate further consideration of remedial options, and determination that the screening process logically arrives at a final list of SMA-focused and harbor-wide alternatives to be analyzed in the FS.
5. Present and discuss the approach to performing the analysis of alternatives, the metrics that will be used to allow for a useful and transparent analysis, and the analyses to be performed. It is recognized that additional discussions after the June 22, 2011 meeting may be needed to meet this objective.

Please note that EPA may not be in a position to "concur" on these items at the meeting, but expects to provide observations during the meeting and more formal feedback to the LWG after the meeting.

INFORMATION THAT SHOULD BE PROVIDED PRIOR TO THE JUNE 22 MEETING

The LWG should present the following information to meet the objectives for the June 22 meeting. It is our understanding that the LWG would provide this information to EPA approximately two weeks prior to the meeting:

1. An overall roadmap and framework for completion of the FS Report and explanation of process details. Details and definitions should be provided such as SMA and how SMAs will be formed from AOPCs and for the harborwide analysis. Details should also be provided on the expected metrics that will be used for the analysis of alternatives.
2. RALs, and supporting info showing how they were calculated/developed; these should be presented for all the contaminants with established PRGs.

3. SMAs (and sub-SMAs if used) for both specific locations (presumably refinements of current AOPCs) and harbor-wide. Ideally, this is provided graphically (hardcopy/pdf and ArcGIS shapefile) with supporting text explaining the rationale for each SMA.
4. A table outlining preliminary alternatives developed for each AOPC or technology options for each SMA that will be formed into preliminary remedial alternatives. An initial screening may be performed to reduce the list of AOPC preliminary remedial alternatives that will then be combined into sitewide preliminary remedial alternatives that may be further screened to arrive at a logical set of discrete remedial alternatives for the site.
5. Examples of graphics & other data presentations that will be used to support and explain the alternatives evaluation, and to support and explain the results of the evaluation, in the draft FS Report.

The issue of time to achieve protection will be a critical issue. SMA-specific information will be used to develop a set of remedial action alternatives that involve to varying degrees dredging/excavation, capping (including active capping technologies), in-situ treatment using carbon amendments, EMNR and MNR with the goal of achieving protectiveness (or background) within a reasonable time-frame. In addition to SMA specific characteristics that will dictate the application of a specific technology at a specific SMA, two of the key variables will be the trade-off between cost and time to achieve protection (or background). There should be information provided and some discussion during the meeting of how remedies will be evaluated, including use of the models, in light of cost and time to protectiveness given the uncertainties and nature of the long-term contaminant fate and transport model.

In addition, the EPA will be requesting some additional information related to MNR modeling that could be provided separately or as part of the June 22, 2011 check-in based on our review of the LWGs response to EPA's comments on the 2/23/2011 presentation materials. It may be appropriate to add a discussion of this information as part of the June 22, 2011 meeting.